

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION**

|  |   |                                    |
|--|---|------------------------------------|
| Epson America, Inc.  | ) | Civil Action No. 3:18-cv-03134-JMC |
|  | ) |                                    |
| Plaintiff,   | ) |                                    |
|  | ) |                                    |
| vs.  | ) | <b>PLAINTIFF’S MOTION FOR</b>      |
|  | ) | <b>PRELIMINARY INJUNCTION</b>      |
| Curtis International Ltd. and<br>Technicolor SA d/b/a Technicolor USA,<br>Inc. | ) |                                    |
|  | ) |                                    |
|  | ) |                                    |
| Defendant.   | ) |                                    |
|  | ) |                                    |

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Pursuant to Rule 65 of the Federal Rules of Civil Procedure, Plaintiff Epson America, Inc. (“Epson”) respectfully moves for a Preliminary Injunction and Recall Order against Defendants Curtis International Ltd. and Technical SA d/b/a Technicolor USA, Inc. (“Defendants”).

This Motion is supported by the Verified Amended Complaint, Memorandum in Support, evidence of record, arguments of counsel, and applicable law.

WHEREFORE, Epson respectfully requests that the Court enter a PRELIMINARY INJUNCTION ordering Defendants and their subsidiaries, retailers, distributors, and any other person or entity acting in concert or participation with Defendants:

- A. Immediately cease and desist from engaging in further false or misleading advertising with respect to their products’ lumen capacities;
- B. Immediately send corrective notices to their retailers and issue a press release to their customers disclosing their products’ true ANSI lumen capacities; and
- C. For such other and further relief that the Court may deem just and proper.

Charleston, South Carolina  
Dated: March 22, 2019

/s/ Christopher A. Jaros

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ATTORNEYS FOR PLAINTIFF EPSON  
AMERICA, INC.

**CERTIFICATE OF SERVICE**

I, Christopher A. Jaros, hereby certify that on March 22, 2019, this document, filed through the ECF system, will be sent electronically to Curtis International Ltd. as identified on the Notice of Electronic Filing, and will be sent to Technicolor SA d/b/a Technicolor USA, Inc. via certified mail to its registered agent's address.

/s/ Christopher A. Jaros  
Christopher A. Jaros